

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

(1) ISABELA SNEED,)
Plaintiff,)
vs.) Case No. CIV-22-31-R
(1) INDEPENDENT SCHOOL)
DISTRICT NO. 16 OF PAYNE COUNTY,)
OKLAHOMA, a/k/a STILLWATER PUBLIC)
SCHOOL DISTRICT, a/k/a STILLWATER)
INDEPENDENT SCHOOL DISTRICT)
NUMBER 16,)
Defendant.)

DECLARATION OF ISABELLA SNEED

I, Isabella Sneed, as my Declaration in this matter, state the following:

1. I am of lawful age and have personal knowledge of the facts set forth in this Declaration.

2. During the 2017-2018 school year, I was in eighth grade and attending Stillwater Junior High School. During this school year, Alberto Morejon was my history teacher.

3. From the summer of 2018 through May 19, 2020, Morejon frequently sent me naked pictures of his erect penis, through Instagram direct messaging, as well as “imprint” pictures (where Morejon’s penis was visibly erect in his boxer briefs).

4. Morejon would message me almost every day. The conversation always went straight to sex.



5. Morejon and I would sometimes message each other -- through Instagram instant messaging -- until 4:00 AM and then I would have to get up at 7:00 AM to go to school.

6. When Morejon first started sending me these sexually-explicit messages and images, I was only 14-years-old.

7. Morejon used his position of power and trust to sexually exploit me when I was a child.

8. Morejon inundated me with so many pictures of himself that I was able to identify -- for Stillwater Police Department investigators -- the brand (American Eagle), color and type (boxer briefs) of his underwear.

9. Morejon told me to keep his sexual communications with me a secret. At lunch or after school, Morejon would ask to see my cell phone to ensure that I deleted our conversation. If I had not deleted it from my cell phone, then Morejon would delete it.

10. After Morejon was arrested, it was well-known, throughout Stillwater High School, that I was the victim who reported Morejon to the Stillwater Police Department.

11. The continual sexual harassment by Morejon caused me significant anxiety to the point that I could not concentrate on my schoolwork. My grades declined as a result.

12. It was common knowledge among students and staff that I was the individual who reported Morejon to the police.

13. I was the only student with the initials I.G.S. in Stillwater Public Schools, which were publicly released in connection with the report on Morejon.

14. After I made the report, I filmed other students harmlessly goofing off in the FFA barn. I was the only student singled out for punishment by the FFA instructors and banned from keeping my animal in the FFA barn, which effectively removed me from the program.

15. After I made the report, my volley ball coach singled me out, demoted me to junior varsity, and reduced my playing time.

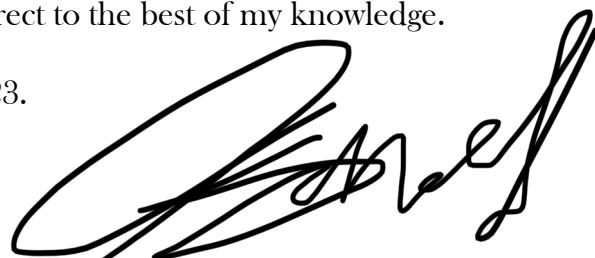
16. In connection with the FFA incident, Officer Hooten, the school resource officer, accused me of doing drugs and threatened to call the police.

17. After I made the report, I was repeatedly and openly harassed by other students online and on campus because I was the one who reported Morejon. The school did nothing about this harassment.

18. After I made the report, the school did not offer me any services, accommodations, support or counseling.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

DATED this 1st day of August 2023.



Isabella Sneed